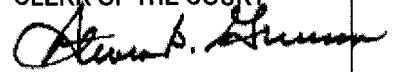


# **Exhibit 1**

# **Exhibit 1**

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CLERK OF THE COURT


**COMP**

TAMARA VANNAH, ESQ.  
Nevada Bar No. 010661  
ROBERT D. VANNAH, ESQ.  
Nevada Bar No. 002503

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*Attorneys for Plaintiff*

CASE NO: A-21-841873-C  
Department 29

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

BYRONT AREVALO CIRIANO,

Plaintiff,

vs.

GEORGE SHANSHASHVILI, an individual;  
HL MOTOR GROUP, INC., a foreign  
corporation; and DOES 1 through 10, inclusive;  
and, ROE CORPORATIONS 1 through 10,  
inclusive,

Defendants.

CASE NO.:  
DEPT NO.:

**COMPLAINT****JURISDICTION**

1. BYRONT AREVALO CIRIANO is an individual who resides in Clark County, Nevada.
2. GEORGE SHANSHASHVILI is an individual who resides in Toronto, Ontario.
3. HL MOTOR GROUP, INC. was and is a foreign corporation, licensed to do business in the State of Nevada, with its principal place of business located at 15 Old Colony Rd., Ste. 33m Richmond Hill, Ontario, Canada.
4. The true names of DOES I through 10, their citizenship and capacities, whether individual, corporate, associate, partnership or otherwise, are unknown to the Plaintiff,

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1 who therefore sues these Defendants by such fictitious names. DOES 1 through 5 are  
2 employers of Defendants who may be liable for Defendants' negligence pursuant to  
3 N.R.S. 41.130. DOES 6 through 10 are immediate family members of Defendants who  
4 may be liable for Defendants' negligence pursuant to N.R.S. 41.440. Plaintiff will ask  
5 leave of this court to insert the true names and capacities of such Defendants when the  
6 same have been ascertained.  
7

### 8 CLAIM FOR NEGLIGENCE

- 9 5. At all times material to this Complaint, the acts and omissions giving rise to this action  
10 occurred in Clark County, Nevada.  
11
- 12 6. On December 13, 2019, BYRONT AREVALO CIRIANO was lawfully operating his  
13 vehicle, traveling northbound on US95 in the #3 travel lane just north of the Horizon  
14 Drive on ramp.  
15
- 16 7. On December 13, 2019, Defendant GEORGE SHANSHASHVILI, who was operating a  
17 vehicle owned by Defendant HL MOTOR GROUP, INC., was traveling northbound on  
18 US95 in the #3 travel lane, directly behind Plaintiff. As Plaintiff BYRONT AREVALO  
19 CIRIANO began to slow down, Defendant GEORGE SHANSHASHVILI was following  
20 too closely and rear ended Plaintiff's vehicle.  
21
- 22 8. On December 13, 2019, GEORGE SHANSHASHVILI was acting within the course and  
23 scope of employment for HL MOTOR GROUP, INC.  
24
- 25 9. HL MOTOR GROUP, INC. is responsible for the actions of its employees, pursuant to  
26 NRS 41.130, and the applicable case law.  
27  
28

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10. Defendant GEORGE SHANSHASHVILI had a duty to drive according to the laws of the state of Nevada and as a reasonable and prudent person would drive a vehicle under similar circumstances.
11. Defendant GEORGE SHANSHASHVILI breached his duty by failing to pay full attention to driving and failed to stop causing a collision with Plaintiff BYRONT AREVALO CIRIANO's vehicle.
12. Defendant GEORGE SHANSHASHVILI's negligence was the actual and proximate cause of physical injuries to Plaintiff BYRONT AREVALO CIRIANO.
13. HL MOTOR GROUP, INC. and/or its employees' acts or failures to act were the actual and proximate cause of the physical injuries to BYRONT AREVALO CIRIANO.
14. Plaintiff BYRONT AREVALO CIRIANO incurred medical expenses, pain and suffering, and lost wages as a result of the accident, and he will continue to incur medical expenses, lost wages, and pain and suffering for the rest of his natural life.

### **DEMAND FOR JUDGMENT**

Wherefore, Plaintiff prays for relief and judgment against Defendants as follows:

1. Compensatory damages in excess of \$15,000;
2. Interest from the time of service of this complaint, as allowed by N.R.S. 17.130;
3. Costs of suit and attorney fees; and,
4. Such further relief as the Court finds just and equitable.

DATED this 29th day of September, 2021.

VANNAH & VANNAH

By: /s/ Tamara Vannah  
 TAMARA VANNAH, ESQ.